

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

CLEMENT WOGHIREN,
Plaintiff,

v.

WYETH and WYETH BIOPHARMA,
Defendants.

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) **CIVIL ACTION NO. 04-12148 WGY**
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PLAINTIFF'S REQUEST FOR SUPPLEMENTAL JURY INSTRUCTIONS

In addition to the jury instructions proposed by the plaintiff in the above-referenced matter, and filed with the Court on September 30, 2005, and those instructions required by law, the plaintiff requests that the Court's instructions to the jury clearly communicate that the plaintiff alleges to have suffered two illegal adverse actions at the hands of the defendants – a demotion and termination. The plaintiff requests that the jury charge clearly inform the jury that they may find for the plaintiff on either alleged adverse action or both. The plaintiff also renews its request that the Court convey a charge relating to “Adverse Action” – plaintiffs request number 7.

Respectfully Submitted,

Clement Woghiren

By his attorneys,

/S/ John F. Tocci

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Dated: January 10, 2006